

MEMO ENDORSED

THE LAW OFFICE of CHRISTOPHER Q. DAVIS

**WORKING SOLUTIONS NYC**

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August 22, 2016

**VIA E-MAIL AND ECF**

The Honorable Andrew L. Carter Jr.  
United States District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: Abdelal, Mohamed v. Commissioner Raymond W. Kelly and City of New York**  
**Civil Action No. 13-cv-04341(ALC)(SN)**

Dear Judge Carter:

Pursuant to Your Honor's Individual Rules, Plaintiff writes with Defendants' consent to respectfully request leave to file five exhibits to Plaintiff's Opposition to Defendants' Motion for Summary Judgment under seal. The parties entered into a Stipulation and Protective Order, filed November 3, 2015 at ECF Docket No. 79, whereby certain documents, including these exhibits, were designated confidential. In support of his Opposition to Defendants' Motion for Summary Judgment, Plaintiff intends to use confidential documents related to Internal Affairs Bureau investigations and documents relating to alleged comparators. In addition to filing these documents under seal, Plaintiff intends to redact, in the publicly-filed version, portions of his Rule 56.1 statement and Memorandum of Law in Opposition that paraphrase the information contained in the sealed documents. Plaintiff intends to file his redacted Rule 56.1 statement and Memorandum of Law in Opposition only after obtaining approval from Your Honor for sealing such information.

We thank for the Court for its consideration of this request.

**SO ORDERED:**

  
**HON. ANDREW L. CARTER, JR.**  
**UNITED STATES DISTRICT JUDGE**

Respectfully,

8-25-16 /s/

Christopher Q. Davis, Esq.

cc: Jessica Giambrone (via ECF)  
Kristen Monet McIntosh (via ECF)